

## CCSAO EX. 1.2

## **ROGER D. COLTON**

### **BUSINESS ADDRESS:**

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### **EDUCATION:**

J.D. (Order of the Coif), University of Florida, 1981

M.A. (Economics), McGregor School, Antioch University (1993)

B.A., Iowa State University (1975)

### **PROFESSIONAL EXPERIENCE:**

**Fisher, Sheehan and Colton, Public Finance and General Economics:** 1985 - present.

As a co-founder of this public interest economics consulting partnership, Colton provides services in a variety of areas, including: regulatory economics, poverty law and economics, public benefits, environmental and natural resource economics, fair housing, community development, energy efficiency, utility law and economics (energy, telecommunications, water/sewer), government budgeting, health care economics, and planning and zoning.

Colton has testified in state and federal courts in the United States and Canada, as well as before regulatory bodies in more than two dozen states. He is particularly noted for creative program design and implementation within tight budget constraints. Colton has published seven books and more than 50 journal articles on a wide range of legal and economic subjects.

**National Consumer Law Center (NCLC):** 1986 - 1994

As a staff attorney with NCLC, Colton worked on low-income energy and utility issues. He pioneered cost-justifications for low-income affordable energy rates, as well as developing models to quantify the non-energy benefits (e.g., reduced credit and collection costs, reduced working capital) of low-income energy efficiency. He designed and implemented low-income affordable rate and fuel assistance programs across the country. Colton was charged with developing new practical and theoretical underpinnings for solutions to low-income energy problems.

**Community Action Research Group (CARG): 1981 - 1985**

As staff attorney for this non-profit research and consulting organization, Colton worked primarily on energy and utility issues. He provided legal representation to low-income persons on public utility issues; provide legal and technical assistance to consumer and labor organizations; and provided legal and technical assistance to a variety of state and local governments nationwide on natural gas, electric, and telecommunications issues. He routinely appeared as an expert witness before regulatory agencies and legislative committees regarding energy and telecommunications issues.

**PROFESSIONAL AFFILIATIONS:**

- Member: Board of Directors, Vermont Energy Investment Corporation.
- Member: Board of Directors, Affordable Comfort, Inc.
- Member: Editorial Advisory Board, International Library, *Public Utility Law Anthology*.
- Member: Fair Housing Commission (Belmont, MA).
- Member: ASHRAE Guidelines Committee, GPC-8, *Energy Cost Allocation of Comfort HVAC Systems for Multiple Occupancy Buildings*
- Member: National Advisory Committee, U.S. Department of Housing and Urban Development, Calculation of Utility Allowances for Public Housing.
- Member: National Advisory Committee, U.S. Department of Health and Human Services, Administration for Children and Families, Performance Goals for Low-Income Home Energy Assistance.

**PROFESSIONAL ASSOCIATIONS:**

National Association of Housing and Redevelopment Officials (NAHRO).  
Association for Enterprise Opportunity.  
Association of Energy Engineers, Energy Marketing Section.  
Iowa State Bar Association.  
Association for Institutional Thought.  
National Community Reinvestment Coalition.  
National Association of Human Rights Workers.  
National Association for Health Services Research.

**BOOKS**

Colton. (1996). *Funding Fuel Assistance: State and Local Strategies to Help Pay Low-Income Home Energy Bills*, Fisher, Sheehan and Colton, Public Finance and General Economics: Belmont, MA (1996).

Colton and Sheehan. (1995). *The Other Part of the Year: Low-Income Households and Their Need for Cooling: A State-by-State Look at Low-Income Summer Electric Bills*, Flying Pencil Publications: Portland, OR.

Colton. (1995). *Energy Efficiency and the Low-Income Consumer: Planning, Designing and Financing*, Flying Pencil Publications: Portland, OR.

Colton and Sheehan. (1994). *On the Brink of Disaster: A State-by-State Look at Low-Income Winter Natural Gas Heating Bills*, Flying Pencil Publications: Portland, OR.

Colton, *et al.*, *Tenants' Rights to Utility Service*, National Consumer Law Center: Boston (1994).

Colton, *The Regulation of Rural Electric Cooperatives*, National Consumer Law Center: Boston (1992).

**JOURNAL PUBLICATIONS*****Published***

Colton. "Consumer Aggregation and Sophisticated Purchasing: Electric Restructuring Lessons from the Health Care Industry." *The Urban Lawyer* (American Bar Association) (submitted for publication: July 1998).

Colton. "Utility Rate Classifications and Group Homes as "Residential" Customers," *Mental and Physical Disability Law Report* (American Bar Association) (submitted for publication: June 1998).

Colton. "Challenging Entrance and Transfer Fees in Mobile Home Park Lot Rentals." Submitted to *Clearinghouse Review* (submitted for publication: July 1998).

Colton and Adams. "Fingerprints for Check Cashing: Where Lies the Real Fraud," *Media Alert: The Quarterly Publication of the National Black Media Coalition* (publication anticipated September 1998).

Colton. (June 1998). "Universal Service: A Performance-Based Measure for a Competitive Industry," *Public Utilities Fortnightly*.

R.Colton and S.Colton. "Evaluating Hospital Mergers," *Health Affairs* (publication anticipated: September/October 1998).

Colton. (Summer 1998). "Supportive Housing Facilities as "Low-Income Residential" Customers for Energy Efficiency Purposes," 7 *Journal of Housing and Community Development Law* 406 (American Bar Association).

Colton, Frisof and King. (Jan. 1998). "Lessons for the Health Care Industry from America's Experience with Public Utilities." 18 *Journal of Public Health Policy* 389.

Colton (Spring 1997). "Fair Housing and Affordable Housing: Availability, Distribution and Quality." *Colloqui* (Cornell University journal of planning).

Colton, (January/February 1997). "Competition Comes to Electricity: Industry Gains, People and the Environment Lose," *Dollars and Sense*.

Colton (Sept. 1996). "The Road Oft Taken: Unaffordable Home Energy Bills, Forced Mobility And Childhood Education in Missouri." 2 *Journal on Children and Poverty* 23.

Colton and Sheehan. (Dec. 1995). "Utility Franchise Charges and the Rental of City Property." 72 *New Jersey Municipalities* 9:10.

Colton. (Dec. 1995). "Arguing Against Utilities' Claims of Federal Preemption of Customer-Service Regulations." 29 *Clearinghouse Review* 772.

Colton and Labella. (Sept. 1995). "Landlord Failure to Resolve Shared Meter Problems Breaches Tenant's Right to Quiet Enjoyment." 29 *Clearinghouse Review* 536.

Colton and Morrissey. (July 1995). "Tenants' Rights to Pretermination Notice in Cases of Landlords' Nonpayment of Utilities". 29 *Clearinghouse Review* 277.

Colton. (January 1995). "The Perverse Incentives of Fair Market Rents." 52 *Journal of Housing and Community Development*

6.

Colton (1994). "Energy Efficiency and Low-Income Housing: Energy Policy Hurts the Poor." XVI *ShelterForce: The Journal of Affordable Housing Strategies* 9.

Colton (1994). "The Use of Consumer Credit Reports in Establishing Creditworthiness for Utility Deposits." *Clearinghouse Review*.

Colton (1994). "Institutional and Regulatory Issues Affecting Bank Product Diversification Into the Sale of Insurance," *Journal of the American Society of CLU and ChFC*.

Colton. (1993). "The Use of State Utility Regulations to Control the 'Unregulated' Utility." 27 *Clearinghouse Review* 443.

Colton and Smith. (1993). "The Duty of a Public Utility to Mitigate 'Damages' from Nonpayment through the Offer of Conservation Programs." 3 *Boston University Public Interest Law Journal* 239.

Colton and Sheehan. (1993). "Cash for Clunkers Program Can Hurt the Poor," 19 *State Legislatures: National Conference of State Legislatures* 5:33.

Colton. (1993). "Consumer Information and Workable Competition in the Telecommunications Industry." XXVII *Journal of Economic Issues* 775.

Colton and Sheehan. (1992). "Mobile Home Rent Control: Protecting Local Regulation," *Land Use Law and Zoning Digest*.

Colton and Smith. (1992 - 1993). "Co-op Membership and Utility Shutoffs: Service Protections that Arise as an Incident of REC 'Membership.'" 29 *Idaho Law Review* 1, reprinted, XV *Public Utilities Law Anthology* 451.

Colton and Smith. (1992). "Protections for the Low-Income Customer of Unregulated Utilities: Federal Fuel Assistance as More than Cash Grants." 13 *Hamline University Journal of Public Law and Policy* 263.

Colton. (Jan./Feb. 1992). "CHAS: The Energy Connection," 49 *The Journal of Housing* 35, reprinted, 19 *Current Municipal Problems* 173.

Colton. (March 1991). "A Cost-Based Response to Low-Income Energy Problems." *Public Utilities Fortnightly*.

- Colton. (1991). "Protecting Against the Harms of the Mistaken Utility Undercharge." 39 *Washington University Journal of Urban and Contemporary Law* 99, reprinted, XIV *Public Utilities Anthology* 787.
- Colton. (1990). "Customer Consumption Patterns within an Income-Based Energy Assistance Program." 24 *Journal of Economic Issues* 1079
- Colton. (1990). "Heightening the Burden of Proof in Utility Shutoff Cases Involving Allegations of Fraud." 33 *Howard L. Review* 137.
- Colton. (1990). "When the Phone Company is not the Phone Company: Credit Reporting in the Post-Divestiture Era." 24 *Clearinghouse Review* 98.
- Colton. (1990). "Discrimination as a Sword: Use of an 'Effects Test' in Utility Litigation." 37 *Washington University Journal of Urban and Contemporary Law* 97, reprinted, XIII *Public Utilities Anthology* 813.
- Colton. (1989). "Statutes of Limitations: Barring the Delinquent Disconnection of Utility Service." 23 *Clearinghouse Review* 2.
- Colton & Sheehan. (1989). "Raising Local Revenue through Utility Franchise Fees: When the Fee Fits, Foot It." 21 *The Urban Lawyer* 55, reprinted, XII *Public Utilities Anthology* 653, reprinted, Freilich and Bushek (1995). *Exactions, Impacts Fees and Dedications: Shaping Land Use Development and Funding Infrastructure in the Dolan Era*, American Bar Association: Chicago.
- Roger Colton. (1989). "Unlawful Utility Disconnections as a Tort: Gaining Compensation for the Harms of Unlawful Shutoffs." 22 *Clearinghouse Review* 609.
- Colton, Sheehan & Uehling. (1987). "Seven cum Eleven: Rolling the Toxic Dice in the U.S. Supreme Court," 14 *Boston College Environmental L. Rev.* 345.
- Colton & Sheehan. (1987). "A New Basis for Conservation Programs for the Poor: Expanding the Concept of Avoided Costs," 21 *Clearinghouse Review* 135.
- Colton & Fisher. (1987). "Public Inducement of Local Economic Development: Legal Constraints on Government Equity

Funding Programs." 31 *Washington University J. of Urban and Contemporary Law* 45.

Colton & Sheehan. (1986). "The Illinois Review of Natural Gas Procurement Practices: Permissible Regulation or Federally Preempted Activity?" 35 *DePaul Law Review* 317, reprinted, IX *Public Utilities Anthology* 221.

Roger Colton. (1986). "Utility Involvement in Energy Management: The Role of a State Power Plant Certification Statute." 16 *Environmental Law* 175, reprinted, IX *Public Utilities Anthology* 381.

Colton. (1986). "Utility Service for Tenants of Delinquent Landlords," 20 *Clearinghouse Review* 554.

Colton. (1985). "Municipal Utility Financing of Energy Conservation: Can Loans only be Made through an IOU?". 64 *Nebraska Law Review* 189.

Colton. (1985). "Excess Capacity: A Case Study in Ratemaking Theory and Application." 20 *Tulsa Law Journal* 402, reprinted, VIII *Public Utilities Anthology* 739.

Colton. (1985). "Conservation, Cost-Containment and Full Energy Service Corporations: Iowa's New Definition of 'Reasonably Adequate Utility Service.'" 34 *Drake Law Journal* 1.

Colton. (1984). "Prudence, Planning and Principled Ratemaking." 35 *Hastings Law Journal* 721.

Colton. (1983). "Excess Capacity: Who Gets the Charge from the Power Plant?" 33 *Hastings Law Journal* 1133.

Colton. (1983). "Old McDonald (Inc.) Has a Farm. . . Maybe, or Nebraska's Corporate Farm Ban; Is it Constitutional?" 6 *University of Arkansas at Little Rock Law Review* 247.

Colton. (1982). "Mandatory Utility Financing of Conservation and Solar Measures." 3 *Solar Law Reporter* 167.

Colton. (1982). "The Use of Canons of Statutory Construction: A Case Study from Iowa, or When Does 'GHOTI' Spell 'Fish'?" 5 *Seton Hall Legislative Journal* 149.

Colton. (1977). "The Case for a Broad Construction of 'Use' in Section 4(f) of the Department of Transportation Act." 21 *St. Louis Law Journal* 113.

**INVITED PAPERS**

Colton, *Competition, Consolidation and Community Service Obligations*, Hunter College Center for Environmental and Occupational Health symposium on *Meeting the Urban Health Care Challenge: A Joint Public Health and Urban Planning Agenda* (September 1998).

Colton, *Communities and Age-Sensitive Planning*, Pratt Institute Symposium on Community Planning, New York City (February 1998).

Colton, *Electric Industry Restructuring and Universal Service for Low-Income Consumers: Lessons from State Health Insurance Purchasing Cooperatives*, National Community Action Foundation (July 1997).

Colton, *The Regulation of Industries Affected with the Public Interest: Lessons for Health Care?*, Universal Health Care Action Network (December 1996).

Colton, *Financing Energy Efficiency in Affordable Housing Programs*, National Association of Housing and Redevelopment Officials (October 1996).

Colton, *Changing Paradigms for Delivering Energy Efficiency to the Low-Income Consumer by Competitive Utilities: The Need for a Shelter-Based Approach*, National Association of State Energy Officials (May 1996).

Colton, *Prepayment Meters and the Low-Income Consumer*, Hydro-Quebec Symposium on Quality Service to Customers, Montreal (May 1995).

Colton and Sheehan, *Linked Deposits as a Utility Investment in Energy Efficiency for Low-Income Housing*, National Regulatory Information Conference (April 1994).

Colton, Sachs and DeBarros, *Models of Public and Private Investment in Energy Efficiency for Low-Income Housing*, American Council for an Energy Efficient Economy Summer Study on Energy Efficiency in Buildings (August 1994).

Colton, *Universal Residential Telephone Service: Needs and Strategies*, presented to the 105th National Meeting of the National Association of Regulatory Utility Commissioners (1993).

Colton and Sheehan, *Securing Private Investment in Low-Income Energy Efficiency: Breaking the Reliance on Government and Utility Programs*, presented to 16th World Energy Engineering Conference (1993).

Colton and Sheehan, *Improving Assisted Housing Affordability by Financing Energy Efficiency Improvements*, presented to 1993 Annual Meeting of the National Association of Housing and Redevelopment Officials (1993).

Colton and Sheehan, *The Economics of Pursuing Energy Efficiency in Affordable Housing*, presented to the 14th International Making Cities Livable Conference (1993).

#### **OTHER PUBLICATIONS**

Colton and Alexander. *The Implications of an Increased Federal Role in the Regulation of Electricity on State Regulation of Consumer Protection and Universal Service Programs* (September 1998).

R.Colton and S.Colton. *The Occupational Control of Tuberculosis in Homeless Shelters*, prepared for the U.S. Occupational Safety and Health Administration (August 1998).

Colton. *The Connection Between Affordable Housing and Educational Excellence in Belmont* (April 1998).

Colton. *Controlling the Occupational Exposure to Tuberculosis in Homeless Shelters: Applying Federal OSHA Standards to Volunteers*, prepared for the U.S. Occupational Safety and Health Administration (February 1998).

Colton. *The Obligation to Serve and a Restructured Electric Industry*, prepared for U.S. Department of Energy, Oak Ridge National Laboratory (June 1997).

Colton. *Structuring and Evaluating a Direct Vendor Payment Shadow Billing Program for Publicly Assisted Housing in Houston*, prepared under contract to Gulf Coast Legal Foundation (with funding by Houston Lighting Company) (April 1997).

Colton. *The For-Profit Conversion of the New England Education Loan Marketing Corporation: Lessons from Non-Profit Hospital Conversions* (March 1997).

Colton. *Rental Housing Affordability in Burlington, Vermont: A Report to the Burlington City Council*. (January 1997).

Colton. *Setting Income Eligibility for Fuel Assistance and Energy Efficiency Programs in a Competitive Electric Industry: The Marginal Impacts of Increasing Household Income* (October 1996).

Colton. *Fair Housing and Affordable Housing in Belmont, Massachusetts: Data on Availability, Distribution and Quality* (October 1996).

Colton and Sheehan. *Fair Housing Analysis of Impediments Study for Washington County (Oregon)*. (July 1996).

Colton. *Structuring a Low-Income "Wires Charge" for New Jersey*, prepared for Citizens Against Rate Escalation (CARE) (August 1996).

Colton. *Structuring a Low-Income "Wires Charge" for Kentucky*, prepared for Louisville Legal Aide Association (August 1996).

Colton. *Structuring a Low-Income "Wires Charge" for Iowa*, prepared for Iowa Bureau of Human Resources, Office of Weatherization (July 1996).

Colton. *Structuring a Low-Income "Wires Charge" for Montana*, prepared for Energy Share of Montana (July 1996).

Colton. *Structuring a Low-Income "Wires Charge" for Oklahoma*, prepared for Oklahoma State Association of Community Action Agencies (June 1996).

Colton. *Structuring a Low-Income "Wires Charge" for Ohio*, prepared for Ohio Legal Services Corporation (June 1996).

Colton. *Structuring a Low-Income "Wires Charge" for Indiana*, prepared for Indiana Citizen Action Campaign (May 1996).

Colton. *Shawmut Bank and Community Reinvestment in Boston: Community Credit Needs and Affordable Housing* (February 1996).

Colton. *Understanding "Redlining" in a Competitive Electric Utility Industry* (December 1995).

Colton. *Energy Efficiency as a Credit Enhancement: Public Utilities and the Affordability of First-Time Homeownership* (October 1995).

Colton. *Competition in the Electric Industry: Assessing the Impacts on Residential, Commercial and Low-Income Customers*, prepared under contract to the National Association of Regulatory Utility Commissioners (October 1995).

Colton. *Performance-Based Evaluation of Customer Collections in a Competitive Electric Utility Industry* (August 1995).

Colton. *Poverty Law and Economics: Calculating the Household Budget*, prepared for presentation to National Legal Aid and Defender Association, Substantive Law Training (August 1995).

Colton. *The Need for Regulation in a Competitive Electric Utility Industry* (July 1995).

Colton. *Rewriting the Social Compact: A Competitive Electric Industry and its Core Customers* (July 1995).

Colton. *The Road Oft Taken: Unaffordable Home Energy Bills, Forced Mobility, and Childhood Education in Missouri*, prepared for the Missouri Association of Head Start Directors (June 1995).

Colton. *Models of Low-Income Utility Rates*, prepared under contract to Washington Gas Company (November 1994) (revised June 1995).

Colton. *Beyond Social Welfare: Promoting the Earned Income Tax Credit (EITC) as an Economic Development Strategy by Public Utilities* (May 1995).

Colton. *Should Regulation of Electricity Depend on the Absence of Competition?* (April 1995).

Colton. *Comprehensive Credit and Collection Strategies in a Competitive Electric Utility Industry*, prepared under contract to Hydro-Quebec (April 1995).

Colton. *Economically Stranded Investment in a Competitive Electric Industry: A Primer for Cities, Consumers and Small Business Advocates* (February 1995).

Colton. *Competitive Solicitation as an Integrated Resource Planning Model: Its Competitive Impacts on Small Businesses Serving Low-Income Households*, prepared under contract to the Arkansas State Weatherization

Colton. *Reviewing Utility Low-Income DSM Programs: A Suggested Framework for Analysis* (February 1995).

Colton. *Least-Cost Integrated Resource Planning in Arkansas: The Role of Low-Income Energy Efficiency* prepared under contract to the Arkansas State Weatherization Assistance Program (January 1995).

Colton. *Addressing Low-Income Inability-to-Pay Utility Bills During the Winter Months On Tribal Lands Served By Electric Co-ops: A Model Tribal Winter Utility Shutoff Regulation* (December 1994).

Colton. *An Earned Income Tax Credit Utility Intervention Kit* (December 1994).

Colton. *Telecommunications Credit and Collections and Controlling SNET Uncollectibles*, prepared under contract to the Connecticut Office of Consumer Counsel (November 1994).

Colton. *Customer Deposit Demands by U.S. West: Reasonable Rationales and the Proper Assessment of Risk*, prepared on behalf of the Staff of the Washington Utilities and Transportation Commission (August 1994).

Colton. *Credit and Collection Fees and Low-Income Households: Ensuring Effectiveness and Cost-Effectiveness*, prepared on behalf of the Missouri Office of Public Counsel (July 1994).

Colton. *Weatherization Assistance Program Evaluations: Assessing the Impact on Low-Income Ability-to-Pay* (July 1994).

*DSM Planning in a Restrictive Environment* (July 1994).

Part 1: *Why Ramping Down DSM Expenditures Can Be "Pro" DSM*

Part 2: *Low-Income Opposition to DSM: Ill-Defined and Misguided*

Part 3: *Low-Income DSM Expenditures as a Non-Resource Acquisition Strategy: The Potential for Niche Marketing*

Colton. *Loan Guarantees as a Utility Investment in Energy Efficiency for Low-Income Housing* (April 1994).

Colton and Sheehan. *"Linked Deposits" as a Utility Investment in Energy Efficiency for Low-Income Housing* (April 1994).

Colton. *Securitizing Utility Avoided Costs: Creating an Energy Efficiency "Product" for Private Investment in WAP* (April 1994).

Colton and Sheehan. *Economic Development Utility Rates: Targeting, Justifying, Enforcing*, prepared under contract to Texas ROSE (February 1994).

Colton and Sheehan. *Affordable Housing and Section 8 Utility Allowances: An Evaluation and a Proposal for Action:*

Part I: *Adequacy of Annual Allowances* (September 1993).

Part II: *Adequacy of Monthly Allowances* (September 1993).

Colton and Sheehan. *Identifying Savings Arising From Low-Income Programs* (April 1993).

Colton. *Low-Income Programs And Their Impact on Reducing Utility Working Capital Allowances* (April 1993).

Colton, et al. *An Assessment of Low-Income Energy Needs in Washington State*. Prepared under contract to the Washington state Department of Community Development. (November 1995).

Colton, et al. *Funding Social Services Through Voluntary Contribution Programs: A Proposal for SNET Participation in Funding INFOLINE's Information and Referral Services in Connecticut*. Prepared under contract with United Way of Connecticut. (October 1993).

Colton. (1993). *Public Utility Credit and Collection Activities: Establishing Standards and Applying them to Low-Income Utility Programs*. Prepared under contract to the national office of the American Association of Retired Persons. April.

Colton. (1992). *Filling the Gaps: Financing Low-Income Energy Assistance in Connecticut*. Prepared under contract to the Connecticut State Department of Human Resources. September.

Colton and Quinn. (1992). *The Impact on Low-Income People of the Increased Cost for Basic Telephone Service: A Study of Low-income Massachusetts Resident's Telephone Usage Patterns and Their Perceptions of Telephone Service Quality*. Prepared under contract to the Massachusetts Office of the Attorney General. July.

Colton and Quinn. (1991). *The ABC's of Arrearage Forgiveness*. Prepared with a grant from the Mary Reynolds Babcock Foundation. November.

Colton and Levinson. (1991). *Energy and Poverty in North Carolina: Combining Public and Private Resources to Solve a Public and Private Problem*. Prepared under contract to the North Carolina General Assembly. May.

Colton. (1991). *The Percentage of Income Payment Plan in Jefferson County, Kentucky: One Alternative to Distributing LIHEAP Benefits*. Prepared with funds provided by the City of Louisville, Kentucky and the Louisville Community Foundation.

May.

Colton. (1991). *The Energy Assurance Program for Ohio: A Cost-Based Response to Low-Income Energy Problems*. Prepared for Cincinnati Legal Aid Society, Dayton Legal Society, and Cleveland Legal Aid Society. April.

Colton. (1991). *Utility-Financed Low-Income DSM: Winning for Everybody*. Prepared with funds provided by the Public Welfare Foundation and the Mary Reynolds Babcock Foundation. April.

Colton. (1991). *Percentage of Income Payment Plans as an Alternative Distribution of LIHEAP Benefits: Good Business, Good Government, Good Social Policy*. Prepared under contract to the New England Electric System (NEES). March.

Colton. (1991). *The Forced Mobility of Low-Income Customers: The Indirect Impacts of Shutoffs on Utilities and their Customers*. January.

Colton. (1990). *Controlling Uncollectible Accounts in Pennsylvania: A Blueprint for Action*. Prepared under contract to the Pennsylvania Office of Consumer Advocate. December.

Colton. (1990). *Nonparticipation in Public Benefit Programs: Lessons for Fuel Assistance*. November.

Colton. (1990). *Why Customers Don't Pay: The Need for Flexible Collection Techniques*. Prepared under contract to the Philadelphia Public Advocate. October.

Colton. (1990). *A Regulatory Response to Low-income Energy Needs in Colorado: A Proposal*. Prepared for the Legal Aid Society of Metro Denver. September.

Colton. (1990). *Determining the Cost-Effectiveness of Utility Credit and Collection Techniques*. Prepared with funds provided by the Mary Reynolds Babcock Foundation. July.

Colton. (1990). *Energy Use and the Poor: The Association of Consumption with Income*. June.

Colton. (1989). *Identifying Consumer Characteristics Which are Important to Determining the Existence of Workable Competition in the Interexchange Telecommunications Industry*. Prepared under contract to the Office of Public Counsel of the Florida Legislature. December.

Colton. (1989). *The Interexchange Telecommunications Industry: Should Regulation Depend on the Absence of Competition*. Prepared under contract to the Office of Public Counsel of the Florida Legislature. December.

Colton. (1989). *Fuel Assistance Alternatives for Utah*. Prepared under contract to the Utah State Energy Office. July.

Colton. (1989). *Losing the Fight in Utah: High Energy Bills and Low-Income Consumers*. Prepared under contract with the Utah State Energy Office. July.

Colton. (1989). *The Denial of Local Telephone Service for Nonpayment of Toll Bills: A Review and Assessment of Regulatory Litigation* (2d ed.). January.

Colton. (1988). *Customer Service Regulations for Residential Telephone Customers in the Post-Divestiture Era: A Study of Michigan Bell Telephone Company*. Prepared under contract to the Michigan Divestiture Research Fund. September.

Colton. (1988). *Low-Income Utility Protections in Maine*. (3 volumes). Prepared under contract to the Maine Public Utilities Commission. July.

- a. Volume 1: *An Evaluation of Low-Income Utility Protections in Maine: Winter Requests for Disconnect Permission.*
- b. Volume 2: *An Evaluation of Low-Income Utility Protections in Maine: Payment Arrangements for Maine's Electric Utilities.*
- c. Volume 3: *An Evaluation of Low-Income Utility Protections in Maine: Fuel Assistance and Family Crisis Benefits.*

Colton. (1988). *The Recapture of Interest on LIHEAP Payments to Unregulated Fuel Vendors: An Evaluation of the 1987 Maine Program*. Prepared with a grant from the Jessie B. Cox Charitable Trust. April.

Colton. (1988). *An Evaluation of the Warwick (Rhode Island) Percentage of Income Payment Plan*. Prepared under contract to the Rhode Island Governor's Office of Energy Assistance. January.

Colton, Hill & Fox. (1986). *The Crisis Continues: Addressing the Energy Plight of Low-Income Pennsylvanians Through Percentage of Income Plans*. Prepared under contract to the Pennsylvania Utility Law Project. October.

Fisher, Sheehan and Colton. (1986). *Public/Private Enterprise as an Economic Development Strategy for States and Cities*. Prepared under contract to the United States Department of Commerce, Economic Development Administration. January.

Roger Colton. (1985). *Creative Financing for Local Energy Projects: A Manual for City and County Government in Iowa*. Prepared under contract to the Iowa Energy Policy Council. December.

Colton. (1985). *The Great Rate Debate: Rate Design for the Omaha Public Power District*. Prepared under contract to the Omaha Public Power District. February.

Grenier and Colton. (1984). *Utility Conservation Financing Programs for Nebraska's Publicly Owned Utilities: Legal Issues and Considerations*. Prepared under contract to the Nebraska Energy Office. July.

Roger Colton. (1984). *The Financial Implications to the Utility Industry of Pursuing Energy Management Strategies*. Prepared under contract to the Nebraska Energy Office. January.